

CHAPTER 15 - ELECTRONIC OFFICE EQUIPMENT ACCESS FOR THE DISABLED

1. PURPOSE. This policy outlines objectives and assigns organizational responsibilities, in compliance with Federal laws and regulations, so that EPA may provide disabled employees access to electronic office equipment and telecommunications devices equivalent to that which is provided for non-disabled employees.
2. SCOPE AND APPLICABILITY. This policy applies to all EPA organizations and their employees.
3. BACKGROUND.
 - a. The Federal Information Resources Management Regulation (FIRMR) includes an accessibility policy implementing Section 508 of the Rehabilitation Act Amendments of 1986. Federal agencies have a responsibility to establish information environments that are accessible to individuals with disabilities. These responsibilities include assessing, planning for, and meeting accessibility requirements of individuals with disabilities when procuring electronic office equipment.
 - b. Computer accommodation has become an integral aspect of information resources management within the Federal Government. Computer accommodation is the acquisition and modification of end user computing equipment to minimize the functional limitations of employees to promote productivity and ensure access to electronic office equipment.
 - c. The goal of accessibility is to provide equivalent access to information resources by non-disabled and disabled individuals. This includes access to data bases, applications programs, and communications capabilities.

- d. Technological advances for non-disabled individuals also offer great long-term improvements in telecommunications accessibility for individuals with hearing and speech impairments. Such advances include electronic mail; facsimile; teleconferencing; LAN-based video imaging; text-based information services and messaging; digital speaker phone; telecommunication device for the deaf (TDD); special modified computer keyboards; messaging beepers with full LCD display; and remote, real-time transcription/translation capabilities. Many of these services are available to agencies through FTS2000, GSA's long-distance telecommunications service. The flexibility inherent in these new telecommunications capabilities makes it possible to accommodate the special requirements of speech and hearing impaired individuals.
- e. GSA is the lead Federal oversight agency providing advisory services and technical assistance to help Federal managers and employees with problems related to extending office automation technologies for productive use by individuals with disabilities. The GSA has established a Clearinghouse on Computer Accommodation (COCA) in the Office of GSA Information Resources Management to provide this type of assistance to agencies.
- f. EPA's Washington Information Center (WIC) and its Regional counterparts work closely with Agency managers and the Office of Human Resources Management to ensure that disabled employees in need of specialized computer or telecommunications equipment are accommodated. The WIC and its Regional counterparts have also been instrumental in helping client organizations obtain and install appropriate computer accommodation products to assist persons with disabilities.

4. AUTHORITIES.

- a. Section 508 of the Rehabilitation Act Amendments of 1986.
- b. FIRM, Section 201.20.103-7 "Accessibility Requirements

for Individuals with Disabilities."

- c. FIRMR, Section 201-18 "Planning and Budgeting."
- d. FIRMR Bulletin - C-8 "Information Accessibility for Employees with Disabilities," January 30, 1991.

- e. FIRMIR Bulletin - C-10 "Telecommunications Accessibility for Hearing and Speech Impaired Individuals," January 30, 1991.
- f. 40 CFR Part 12 "Enforcement of Non-Discrimination on the Basis of Handicap in the Environmental Protection Agency," August 16, 1987.
- g. 29 CFR 1614.203(c) "Reasonable Accommodation."
- h. Public Law 100-542, The Telecommunications Accessibility Enhancement Act of 1988.
- i. FIRMIR Amendment on Electronic Office Equipment Accessibility for Handicapped Employees (P.L. 99-506, Section 508).

5. POLICY.

- a. No EPA employee shall, on the basis of disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity conducted by the Agency.
- b. EPA shall provide disabled and non-disabled employees equivalent access to electronic office and telecommunications equipment to the extent such needs are determined by the Agency in accordance with Federal regulations and to the extent the required accessibility can be provided by industry. In providing equivalent access, EPA shall make reasonable accommodation to provide:
 - (1) access to and use of the same data bases and application programs by disabled and non-disabled employees;
 - (2) enhancement capabilities for manipulating data (i.e., special peripherals) to attain equivalent end-results by disabled and non-disabled employees; and
 - (3) access to and use of equivalent telecommunications

equipment by disabled and non-disabled employees.

- c. EPA shall consider electronic office equipment and telecommunications accessibility for disabled employees when conducting determinations of need and requirements analyses for FIP resources.

- d. EPA management and technical personnel shall work closely with contracting officials when contracting for new or additional FIP resources to ensure accessibility to FIP resources by individuals with disabilities.
- e. In accordance with FIRMR 201-17.001, EPA shall acquire FIP resources for individuals with disabilities that result in the most advantageous alternative to the Government after consideration of sharing and reuse of existing FIP resources and use of GSA services when appropriate.
- f. EPA shall provide training and education on electronic office equipment and telecommunication devices for disabled individuals, including services and features of the GSA relay service.
- g. EPA shall publish access numbers for Telecommunication Device for the Deaf (TDD) and TDD-related devices in Agency telephone directories and provide such numbers to GSA for inclusion in the Federal TDD Directory.
- h. EPA shall display in its facilities the standard logo specified by GSA for indicating the presence of TDD or TDD-related equipment.

6. RESPONSIBILITIES.

- a. The Assistant Administrator for Administration and Resources Management is the Designated Senior Official (DSO) for IRM and is responsible for:
 - (1) Ensuring EPA compliance with Federal regulations governing accessibility of electronic office equipment and telecommunication devices to disabled employees.
 - (2) Ensuring that all disabled employees are provided reasonable accommodation for access to electronic office equipment and telecommunication technology.
 - (3) Ensuring that all Agency officials and employees are informed of their responsibilities and rights

addressed in EPA's policy on accessibility to electronic office equipment.

- (4) Ensuring that contracts for new and additional FIP resources provide provisions to facilitate access to FIP resources by disabled individuals.
 - (5) Monitoring Agency progress toward achieving accessibility goals.
- b. The Director, Office of Human Resources Management is responsible for:
 - (1) Consulting with disabled employees on an individual basis to identify their needs and inform them of Agency and Federal resources.
 - (2) Referring disabled employees to the WIC, its Regional counterparts, or National Data Processing Division for technical services when necessary.
 - (3) Incorporating awareness training on the technology needs of disabled employees into EPA's general management training curriculum.
- c. The Director, Office of Information Resources Management is responsible for:
 - (1) Developing Agency policy which reflects Federal requirements governing accessibility to information technology by disabled employees.
 - (2) Reviewing progress made toward achieving information technology accessibility for EPA disabled end-users.
 - (3) Incorporating accessibility issues into the Agency Five Year Information Technology Plan.
- d. The Director, National Data Processing Division is responsible for:

- (1) Appointing a representative to serve as EPA's liaison with GSA's COCA and as the Agency's lead technical advisor on accessibility issues.
 - (2) Obtaining information on successful EPA applications of computer and telecommunications support for disabled EPA employees, and providing that information to the GSA COCA for sharing government-wide.
 - (3) Providing technical advice to Agency managers and disabled employees on the use of computers and telecommunication devices to support the job performance of disabled employees.
 - (4) Reviewing and approving all telecommunication changes and procurements subject to FIRMR review.
 - (5) Providing telecommunications assistance to all field locations.
 - (6) Ensuring that TDD and TDD-related device telephone numbers are included in EPA telephone directories and ensuring that these numbers are provided to GSA for inclusion in the Federal TDD Directory.
- e. The Director, Office of Civil Rights is responsible for:
- (1) Coordinating the development and implementation of civil rights policies and supporting program offices to ensure that no qualified EPA employee shall, on the basis of a disability that is subject to reasonable accommodation, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under, any program or activity conducted by the Agency.
- f. The Director, Office of Acquisition and Management is responsible for:
- (1) Ensuring that Agency solicitation documents and contracts address the needs of disabled employees

by incorporating functional specifications addressing input, output and documentation issues.

- (2) Ensuring that prospective vendors can demonstrate the ability to provide EPA with equivalent or better access to proposed replacement FIP resources than to accommodation hardware or software currently in place.
 - (3) Specifying in Agency solicitations and contracts that the Agency be permitted to install additional accommodation devices, peripherals, or software that may be acquired from a third party, without voiding the maintenance and warranty agreements of the contract, provided such devices or peripherals conform to the electrical specifications of the system and can be connected through standard expansion slots or peripheral ports.
- g. The Director, Facilities Management and Services Division is responsible for:
- (1) Ensuring that signs are displayed in EPA facilities using the standard logo specified by GSA for indicating the presence of TDD or TDD-related equipment.
- h. Assistant Administrators, Associate Administrators, Regional Administrators, Laboratory Directors, Headquarters Staff Directors, General Counsel and the Inspector General are responsible for:
- (1) Ensuring that employees within their organizations comply with the Federal and Agency regulations and policies governing accessibility to electronic office equipment and telecommunication devices by disabled employees.
 - (2) Providing information as requested by GSA or OARM on the computer and telecommunication accommodations of disabled employees in their organization.
- i. Senior IRM Officials are responsible for:

- (1) Providing contracting officials, for inclusion in the solicitation, an inventory and description of any current accommodation hardware or software within the organization they represent along with the resources scheduled for replacement or modification.
 - (2) Ensuring that the accessibility needs of their current and future employees are addressed in their organization's component of the Agency's Five Year Information Technology Plan.
- j. Personal Computer Site Coordinators (PCSCs) are responsible for:
 - (1) Providing basic technical assistance at the workstation to persons with disabilities, and obtaining further guidance and assistance from the National Data Processing Division, the WIC and/or its Regional counterparts as needed.
- k. Each EPA Manager or Supervisor is responsible for:
 - (1) Identifying requirements of disabled employees.
 - (2) Referring disabled employees to the Agency's National Data Processing Division, the WIC, and/or its Regional counterparts for technical services when necessary.

- (3) Ensuring that no current or prospective EPA employee within their organizational unit shall, on the basis of disability, be denied reasonable accommodation or access to electronic office equipment and telecommunication devices.
- (4) Working with the Office of Human Resources Management, NDPD, WIC, and/or its Regional counterpart's personnel to ensure the electronic office equipment and telecommunication device needs of disabled employees are met.

7. DEFINITIONS.

- a. "Disabled" refers to any person who has a physical or mental impairment, including a hearing or speech impairment, that substantially limits a major life activity, has a record of such impairment, or is regarded as having such an impairment.
- b. "Major life activity" includes functions such as caring for oneself, walking, seeing, hearing, speaking, breathing, learning, and working.
- c. "Reasonable Accommodation," per 29 CFR 1614.203(c), may include, but shall not be limited to:

- ! making facilities readily accessible to and usable by handicapped persons, and

- ! job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, appropriate adjustment or modification of examinations, the provision of readers and interpreters, and other similar actions.

In determining reasonable accommodation, factors to consider may include:

- ! the overall size of the EPA organization with respect to the number of employees, number and

type of facilities and size of budget;

- ! the type of Agency operation, including the composition and structure of the Agency's work force; and
- ! the nature and the cost of the accommodations.

- d. "Special peripheral" is defined in Section 508 of Public Law 99-506 as a special needs aid that provides access to electronic equipment that is otherwise inaccessible to a disabled individual.
- e. "Telecommunications Device for the Deaf" (TDD) is a device that permits people with hearing and/or speech impairments to communicate over a standard telephone with another TDD user or through a relay operator to reach a non-TDD user.
- f. "Senior Information Resources Management Officials (SIRMOS)" are EPA officials responsible for directing and managing office-wide information resources planning and budgeting and for assuring that the information systems and information technology acquisitions within their organizations comply with Federal and EPA policies and regulations.

8. FEDERAL GUIDANCE.

- a. 40 CFR Chapter 1 §12.150 (a)(2) stipulates that an Agency must seek to accommodate persons with disabilities for use of electronic office equipment, but that it is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of a program or activity, or in an undue financial and administrative burden.
- b. FIRMR Bulletin C-8, "Information Accessibility for Employees with Disabilities," (Attachment A) contains a detailed explanation of the major areas that need to be considered in developing specifications, in conjunction with requirements determination, to ensure electronic equipment accessibility for disabled employees (i.e., input alternatives, output alternatives and documentation).
- c. FIRMR Bulletin C-10 "Telecommunications Accessibility for Hearing and Speech Impaired Individuals" includes three attachments. Attachment A addresses the Federal Information Relay Service (FIRS). Attachment B includes the Federal Telecommunications Devices for the

Deaf (TDD) Directory, and Attachment C provides guidance on Agency Telecommunications Accessibility Planning.

- d. "Managing End User Computing for Users with Disabilities" (GSA KGD-91-1-I) provides guidance to agency managers determining accommodation strategies for FIP resource accessibility. This handbook stresses the importance of consulting with individual users as a first step to assessing technology requirements. It is available from COCA at the address noted below.

9. SERVICES OF GSA'S CLEARINGHOUSE ON COMPUTER ACCOMMODATION (COCA).

- a. Responds to requests for general information on frequently used hardware/software and workstation furnishings to accommodate individuals with disabilities.
- b. Assists agencies with researching specific hardware, software, and communications problems associated with an employee's electronic office equipment and telecommunication device accommodation requirements.
- c. Provides on-going consultative/technical assistance to agencies during planning, acquisition, and installation of individual and agency-wide office automation systems.
- d. Conducts workshops on computer accommodation procedures.
- e. The address and phone number are:

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